

### REMARKS

Claims 33, 34 and 37-61 are pending, with claims 33, 46 and 51 being independent. Claims 33, 34 and 37-61 are rejected. No amendment has been made. Applicant requests reconsideration and allowance in view of the following remarks.

### ARGUMENTS

The Examiner rejected claims 33, 38, 39, 43-45, 51, 52, 56, 60 and 61 under 35 U.S.C. § 103(a) as being unpatentable over Gelinotte (U.S. Patent Application Publication No. 2004/0229682, hereinafter as “Gelinotte”).

Applicant respectfully traverses these rejections as discussed below.

Regarding claims 33 and 51, claim 33 is drawn to a gaming table, and claim 51 is drawn to a method for utilizing a gaming table.

The Examiner, at pages 2 and 3 of the Office Action, asserted that Gelinotte discloses a gaming table including all of the elements of the claimed gaming table.

However, Applicant respectfully submits that Gelinotte does not teach or suggest anything relating to a gaming table. It is noted that Gelinotte is directed only to a station for storing, reading and/or writing into a memory of gaming chips stored in the station. See for example, paragraph [0003] of Gelinotte. **A gaming table is not disclosed or suggested throughout the disclosure of Gelinotte.**

Interpreting the storage station of Gelinotte as the Examiner did would mean that the Examiner is not reading the claims in light of the specification, which is required. For example, on page 2, lines 8-16 of the present application, the gaming table is described with respect to the prior art as at least containing a tabletop for playing certain games in casinos. Also, the definition of a gaming table is provided at <http://wordnetweb.princeton.edu>, as “a table used for

gambling; may be equipped with a gameboard and slots for chips.” Thus, **a gaming table should at least have a tabletop for playing**, whereas a station for storing, reading and /or writing in a memory of gaming chips, as in the case of Gelinotte, does not have a tabletop at all.

One of the objectives of the present invention is to provide a gaming table having a certain layout of the tabletop so as to dispose the chip test area beside the chip storage area, wherein the display screen is physically separate from the casing of the test station, so as to place such elements within reach and within sight of the table operator (see page 2, lines 8-16 of the present specification for example). This objective is clearly different from that of Gelinotte, which is to provide simply a storage station for reading and/or writing into the memory of the gaming chips stored in the station. By reading the entire disclosure of the present invention and simply viewing Figure 1 of the present application (which shows individual gaming stations 19 for individual players 20), and from the definition of a gaming table as understood by one of ordinary skill in the art (as recited above), the station of Gelinotte should not be interpreted as a gaming table, especially as it does not contain any gaming stations for individual players.

Thus, Gelinotte does not disclose a gaming table having the claimed features recited in the present claims, *i.e.*, the claimed gaming table is not analogous to a station for storing chips, even if a station might be a part of the claimed gaming table.

Accordingly, Gelinotte does not disclose at least a tabletop, an operator side, a display device, a gaming station, a test station and a test area, which are required for the claimed gaming table, as further discussed below.

Claim 33 recites, *inter alia*, “a tabletop comprising an operator side on a first side,” as recited in the first paragraph of claim 33.

Regarding this limitation, the Examiner, at page 3 of the Office Action, alleged that Gelinotte, at Figure 2A, discloses this limitation and cited “dealer located on flat side of gaming table.”

However, Gelinotte, at Figure 2A, merely illustrates a view of antenna means of the station, which has nothing to do with a gaming table (items 46-50 are antenna means as described in paragraph [0064] of Gelinotte). Also, Figure 2A does not show a dealer located on the flat side of the station. Because Gelinotte’s station is not a gaming table, Figure 2A does not disclose a tabletop comprising an operator side. Applicant respectfully draws the Examiner’s attention to paragraph [0059] of Gelinotte, which states that in its figures, item 10 is a tray to accommodate gaming chips (shown in item 10 as plates or disks) and therefore, item 10 is not a tabletop of a gaming table.

Thus, Gelinotte does not teach or suggest a gaming table having a tabletop comprising an operator side.

Further, claim 33 requires, *inter alia*, “said operator side comprising at least one gaming chip testing area, a display device, and a gaming chip storage area, wherein said display device and said gaming chip storage area are placed on the tabletop in reach and in view of an operator.”

Regarding these limitations, the Examiner asserted at page 3 of the Office Action that Gelinotte discloses these limitations at page 1, paragraph [0010], and cited, “[T]he chip is read when laid flat on tabletop but also in chip storage area.”

However, Applicant asserts that this passage has nothing to do with Gelinotte’s storage station for gaming chips, as it is related to the chips and the chip racks disclosed in EP 0740818, which is discussed in the description of the prior art of Gelinotte. Accordingly, paragraph [0010], to which the Examiner referred, relates to the apparatus of EP 0740818 which is

described at the start in paragraph [0009], and has nothing to do with the storage station of Gelinotte.

Additionally, Applicant respectfully submits that the cited passage “[T]he chip is read when laid flat on tabletop but also in chip storage area” does not teach or suggest anything about the structure of the claimed table, which is recited as “said operator side comprising at least one gaming chip testing area, a display device, and a gaming chip storage area, wherein said display device and said gaming chip storage area are placed on the tabletop in reach and in view of an operator.”

Regarding the claimed features of the display device, the Examiner, at page 3 of the Office Action, asserted that Gelinotte, at page 4, paragraph [0062], discloses this limitation. Further, the Examiner asserted that the “display peripheral” at page 4, paragraph [0061] of Gelinotte teaches the claimed features of the display device.

However, paragraph [0061] of Gelinotte merely states that “the processor unit 22 *communicates with the outside world* (display peripheral, keyboard, modem, network interfaces, sever, etc.) via input/output (I/O) lines 29, either in point to point mode or in network mode” (emphasis added). As such, the display disclosed in Gelinotte is an outside device connected to the storage station via the I/O lines. Therefore, this display peripheral does not teach or suggest the limitations regarding the display device located on the tabletop within reach of the operator, as recited in claim 33.

Regarding the claimed features of the testing area and the test station, the Examiner cited Gelinotte at paragraphs [0015] and [0016]. These passages disclose that the station for storing gaming chips is able to read and write into the memory of the chips. However, Gelinotte does

not disclose where the storage station is located in a gaming table, i.e., this passage regarding the storage station does not teach nor suggest anything pertaining to the location of the testing area.

As such, Gelinotte does not disclose a particular chip testing area where gaming chips are placed in order for the table operator to calculate the total value of the chips and to compare the calculated value with the value displayed on the display screen, thereby verifying the authenticity of the gaming chips. All in all, there is no teaching in the entire disclosure of Gelinotte relating to the chip testing area (or test station) being located on the tabletop, as recited in claim 33.

Therefore, claims 33 and 51 patentably distinguish over Gelinotte, and should be allowable.

Claims 38 and 52 require, *inter alia*, the limitations “the communication unit is one of wholly or partially *under the tabletop of the gaming table* and said test station also incorporates in its casing the processing unit which has an output connected to the display device” (emphasis added).

The Examiner, at page 4 of the Office Action, asserted that Gelinotte, at page 2, paragraph [0031], discloses a communication unit wholly or partially under the tabletop of the gaming table. However, these claims require a specific arrangement of the communication unit with respect to the tabletop, i.e., under the tabletop of the gaming table, which is not disclosed in Gelinotte. Additionally, paragraph [0031] merely states that a plurality of antennas is partially or wholly integrated, at best in a different embodiment. Even if Gelinotte suggested a partial or whole integration of antennas into another device, such as a gaming table, that would still be independent or distinct from the disposition of the communication unit.

Thus, Gelinotte does not teach the distinguishing limitations of these claims. Therefore, these claim rejections should be withdrawn.

Regarding claim 39, this claim is dependent from claim 33, which should be allowable, and therefore, the rejection of claim 39 should be withdrawn.

Claims 43, 44, and 56 require, *inter alia*, the limitation “on the tabletop, other areas for one of a) electronically reading or b) electronically reading and writing gaming chips associated with antennas having multiplex connections to the test station and via said test station to the screen of the display device.”

Regarding this limitation, the Examiner asserted, at page 4 of the Office Action, that Gelinotte, at page 2, paragraph [0033], discloses such limitations. However, paragraph [0033] merely describes an antenna incorporated into a reading/writing station, and does not disclose any teaching of a multiplexing circuit that is used to connect a plurality of antennas to the test station. Therefore, these claim rejections should be withdrawn.

Regarding claims 60 and 61, these claims are dependent from claim 33, which should be allowable, and therefore, the rejection of these claims should be withdrawn.

The Examiner further rejected claims 34, 40-42, 53-55 and 59 under 35 U.S.C. § 103(a) as being unpatentable over Gelinotte, and further in view of Walker *et al.* (U.S. Patent Application Publication No. 2006/0287068, hereinafter as “Walker”).

Applicant respectfully traverses these rejections, as discussed below.

Claim 34 requires, *inter alia*, the limitation that “the screen of the display device is a flat screen *mounted flush with the tabletop*” (emphasis added).

Regarding this limitation, the Examiner, at page 5 of the Office Action, admitted that Gelinotte does not disclose the screen mounted flush with the tabletop, and instead asserted that Walker, at page 5, paragraph [0062], teaches “a display located in the dealer area and only visible to the dealer.” Particularly, the Examiner referred to a display referenced with number 142 as

seen in Figure 8 of Walker. Also, the Examiner asserted that “rearranging parts of an invention involves on [sic] routine skill in the art.”

However, the display device in Figure 8 of Walker is connected to the table and is not mounted flush with the tabletop. Thus, the limitation recited in claim 34 is not taught nor suggested by Walker. Applicant respectfully submits that the arrangement required by claim 34 is not accomplished by “routine skill.” The required arrangement serves a specific purpose and requires engineering of a gaming table that can function properly in many manners. Thus, this claim rejection should be withdrawn.

Claims 40 and 53 require, *inter alia*, the limitation that “the gaming chip testing area is located beside a tip box.”

Regarding this limitation, the Examiner, at page 5 of the Office Action, admitted that Gelinotte does not disclose this limitation. Instead, the Examiner, at page 5 of the Office Action, asserted that Walker, at Figure 5, lead line 102, teaches “a tip box located on the gaming table.” However, the tip interrogator 102 in Figure 5 of Walker, which is referred to by the Examiner, serves to report to a site controller any data relating to the tabletop or tip box, and therefore is not a tip box, and nowhere in Walker is it disclosed that the location of a tip box is beside the gaming chip testing area on the gaming table (as its location is not disclosed).

Additionally, although the Examiner alleged that Walker teaches a tip box located on the gaming table (to which Applicant disagrees), Walker does not teach the location of the chip testing area, and thus, Walker cannot disclose that its tip box is located beside the chip testing area. Thus, Walker does not cure the deficiency of Gelinotte with respect to the limitation of “wherein the gaming chip testing area is located beside a tip box.” Therefore, this rejection should be withdrawn.

Claim 41 requires, *inter alia*, the limitations “two gaming chip testing areas are disposed laterally on either side of the chip rack and are combined with one of, a screen that is centrally located with respect to the chip rack, or with two lateral screens” (emphasis added). Claim 54 requires substantially the same limitation. Claim 42 depends from claim 41, and claims 55 and 59 depend from claim 54.

Regarding these limitations, the Examiner, at page 6 of the Office Action, asserted that “Gelinotte discloses the invention substantially as claimed except for explicitly disclosing that the display is centrally located.”

However, these claims are not directed only to the screen located in a central location, but also to two lateral screens that are combined with two gaming chip testing areas being disposed laterally on either side of the chip rack. Thus, Gelinotte does not teach the claimed feature of disposing two gaming chip testing areas.

Additionally, the Examiner, at page 6 of the Office Action, asserted that Walker’s display teaches the limitations regarding the location of the display as recited in these claims. Particularly, the Examiner asserted that “it would have been an obvious matter of design choice to locate the display in a central location that can be viewed by the dealer, since the Applicant has not disclosed that it solves any stated problem or is for any particular purpose and it appears that the invention would perform equally as well.”

Applicant respectfully submits that the specification of the present application, at the second and third paragraphs on page 2, discloses problems with respect to other locations of a display in prior art gaming tables. One advantage of the present invention is that it allows the operator to manipulate the chips without looking away from the playing area, as disclosed in these paragraphs. As such, it would not have been obvious to locate the display in any manner as



the Examiner alleged. While the display can be placed in a particular position for easy viewing, that position might have a negative impact on the operator's manipulation of the chips. To state that it would have been obvious to have a centrally-located display, as done by the Examiner, without any proper basis, would be considered improper hindsight. Thus, this rejection should be withdrawn.

The Examiner further rejected claims 46-50 and 57 under 35 U.S.C. § 103(a) as being unpatentable over Gelinotte and French (U.S. Patent No. 5,735,742, hereinafter as "French"), and further in view of Walker *et al.*

Regarding claim 46, the claim has similar limitations as those recited in claim 33. As such, the same arguments for claim 33 apply equally here and are incorporated by reference.

Additionally, the Examiner, at pages 6 and 7 of the Office Action, asserted that Gelinotte and French disclose a chip testing area (station) and the screen of the display device. However, as discussed above, Gelinotte and French do not teach limitations such as "at least one chip testing station," "antennas having appropriate multiplex connections to the test station," "a communication unit wholly or partially under the tabletop of the gaming table," or "two gaming test areas combined with one or two lateral screens." Thus, the claimed features of claim 46 would not have been obvious over Gelinotte in view of French, such that this rejection should be withdrawn.

Regarding claims 47-50 and 57, all of these rejected claims are dependent on independent claim 33 or independent claim 51. Thus, if independent claims 33 and 51 are allowable, then these dependent claims also should be allowable.

The Examiner further rejected claim 37 under 35 U.S.C. § 103(a) as being unpatentable over Gelinotte, and further in view of French.

Claim 37, *inter alia*, recites that “the screen of the display device has a single display line parallel to the proximal operator side of the tabletop.”

Regarding this limitation, the Examiner, at page 9 of the Office Action, asserted that French, at column 6, lines 45-49, discloses “a plurality of bet amount displays associated with each player in proximity of the operator.”

However, the bet amount displays of French are distinctive from the display device recited in claim 37 because they are located differently and have different functions from the claimed display. The bet amount displays in French are associated with the player station for players' views, thereby facilitating the convenience to gaming players. However, this claim requires that the display device is placed in reach and in view of a table operator so that fast testing of authenticity of the gaming chips is possible by way of the table operator's comparison of the displayed value with the value calculated by the operator. Therefore, this claim patentably distinguishes over Gelinotte in view of French, and withdrawal of this rejection is respectfully requested.

For the foregoing reasons, claims 33, 34 and 37-61 also are patentable over the applied prior art, and should be allowable.

Accordingly, reconsideration of the outstanding Office Action and allowance of the present application and all the claims therein are respectfully requested and believed to be appropriate.

It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims)

that have not been expressed. Finally, nothing in this reply should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this reply.

Should the Examiner have any questions or comments regarding this matter, the undersigned may be contacted at the below-listed telephone number.

Respectfully submitted,  
Pat BUTRICO et al.



Abraham HersHKovitz  
Reg. No. 45,294

Dinh X. Nguyen  
Reg. No. 54,923

Jae Youn Kim  
L0485

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HersHKovitz & Associates, LLC  
2845 Duke Street  
Alexandria, VA 22314  
Telephone 703-370-4800  
Facsimile 703-370-4809  
E-Mail patent@hershkovitz.net

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